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12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA, ) NO. CR 20-000469 HSG  
17 Plaintiff, ) STIPULATION AND ORDER EXCLUDING TIME  
18 v. ) UNDER THE SPEEDY TRIAL ACT  
19 ANGEL GABRIEL RAMIREZ, )  
20 Defendant. )

21 A change of plea hearing is scheduled in this case for March 31, 2021. For the reasons stated on  
22 the record on March 8, 2021, counsel for the United States and counsel for the defendant, Angel Gabriel  
23 Ramirez, jointly stipulate and request that time be excluded under the Speedy Trial Act from March 8,  
24 2021 to March 31, 2021.

25 The government and counsel for the defendant have agreed that time be excluded under Federal  
26 Rule of Criminal Procedure 5.1 and the Speedy Trial Act so that defense counsel can continue to  
27 prepare, including by reviewing discovery produced by the government and discussing a proposed  
28 resolution. For these reasons, the parties stipulate and agree that excluding time until March 31, 2021,  
will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties

STIPULATION TO EXCLUDE TIME  
AND ~~PROPOSED~~ ORDER  
No. CR 20-000469 HSG

1 further stipulate and agree that the ends of justice served by excluding time from March 8, 2021 to  
2 March 31, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public  
3 and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

4 The undersigned Assistant United States Attorney certifies that she has obtained approval from  
5 counsel for the defendant to file this stipulation, request, and proposed order.

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7 IT IS SO STIPULATED.

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9 DATED: March 9, 2021

/s/ Molly K. Priedeman  
MOLLY K. PRIEDEMAN  
Assistant United States Attorney

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11 DATED: March 9, 2021

/s/ Jerome Matthews  
JEROME MATTHEWS  
Attorney for the Defendant

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28 STIPULATION TO EXCLUDE  
TIME AND ORDER  
No. CR 20-000469 HSG

## ORDER

2       Based upon the representations of counsel and for good cause shown, the Court finds that failing  
3 to exclude the time from March 8, 2021 to March 31, 2021 would unreasonably deny defense counsel  
4 and the defendant the reasonable time necessary for effective preparation and continuity of counsel,  
5 taking into account the exercise of due diligence. 18 U.S.C. §3161(h)(7)(B)(iv). The Court further finds  
6 that the ends of justice served by excluding the time from March 8, 2021 to March 31, 2021 from  
7 computation under the Speedy Trial Act outweighs the best interests of the public and the defendant in a  
8 speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time  
9 from March 8, 2021 to March 31, 2021 shall be excluded from computation under the Speedy Trial Act.  
10 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: 3/10/2021

Haywood S. Gill Jr.  
THE HON. HAYWOOD S. GILLIAM, JR.  
United States District Judge